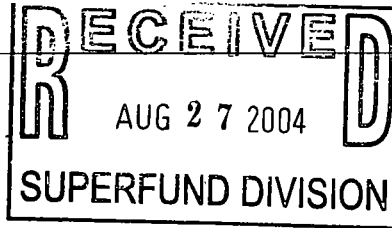




465894

A.B. Dick Company**Jeffrey S. Herden**
General Counsel
and Secretary

August 23, 2004

U.S. Environmental Protection Agency
Ms. Marsha A. Adams
Remedial Enforcement Support System
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604-3590

Re: The Chemical Recovery Systems Site, Elyria, Ohio

Dear Ms. Adams:

This letter is written in response to the U.S. Environmental Protection Agency's (EPA") General Notice of Potential Liability ("Notice") and the Information Request ("Request") dated June 3, 2004, sent to Addressograph/Multigraph, c/o A.B. Dick Company. We appreciate the EPA's willingness to extend the time for us to respond to both the Notice and the Request.

We believe some background information may be helpful in the EPA's understanding of our responses. Addressograph/Multigraph has not existed as a legal entity of any sort for many years. It is our understanding that Addressograph/Multigraph became A.M. International, Inc. ("AMI"). AMI then filed for bankruptcy protection. Thereafter, AMI became Multigraphics, Inc. ("Multi"). Multi itself filed for bankruptcy protection.

Paragon Corporate Holdings, Inc. ("Paragon") purchased the stock of A.B. Dick Company ("ABD") in 1997. In 2000, Paragon purchased the stock of Multi, and integrated the operations of both companies. Multi was dissolved, and merged into Multigraphics LLC, a Delaware limited liability company. Paragon and ABD both filed for bankruptcy protection on July 13, 2004.

The documents related to Addressograph/Multigraph are virtually non-existent. I have conducted a thorough search of the records, and interviewed long-term employees who were employed under the Addressograph/Multigraph name, all in an effort to provide a meaningful response to the Notice and Request. Unfortunately, there are just no records available. Responses to your request are enclosed.

As to the Notice, please be advised that ABD disclaims any responsibility as a PRP or otherwise regarding the site. ABD has no knowledge whatsoever regarding any activity at that site and never transported any materials at all to the site. No one at ABD arranged for disposal or treatment, or arranged for transportation for disposal or treatment, for materials of any hazardous substances at the site.

The statements contained in this letter are based solely on the information and belief of the author and should not be taken by the EPA as absolutely accurate.

Very truly yours,

Jeffrey S. Herden

RESPONSE TO INFORMATION REQUEST

1. William Murphy, A.B.Dick Company, 7400 Caldwell Ave., Niles, IL 60174, former Multigraphics, Inc. employee.
2. Only those documents provided by the EPA.
3. Al Lindblad, a former Multi employee, now believed to be living in Florida, may have some information. Bill Kuchta, last known address in Holmesville, Ohio.
4. A.B.Dick – Des Plaines, IL - ILR00060236
Multi – former Mt. Prospect, IL – ILD000130190
Addressograph/Multigraph – No knowledge
5. No knowledge.
6. None.
7. No knowledge
8. No knowledge, except as set forth in EPA documents. However, the documents provided by the EPA are confusing at best. This response is not intended to be an admission that respondent engaged in any activities as described.
9. No knowledge
10. If respondent is meant to be Addressograph/Multigraph, the response is no knowledge. If the respondent is meant to be A.B.Dick, we respectfully suggest that this request is neither relevant nor material, as A.B.Dick did not conduct any activities related to the CRS site at any time.
11. If respondent is meant to be Addressograph/Multigraph, the response is no knowledge. If the respondent is meant to be A.B.Dick, we respectfully suggest that this request is neither relevant nor material, as A.B.Dick did not conduct any activities related to the CRS site at any time.
12. If respondent is meant to be Addressograph/Multigraph, the response is no knowledge. If the respondent is meant to be A.B.Dick, we respectfully suggest that this request is neither relevant nor material, as A.B.Dick did not conduct any activities related to the CRS site at any time.

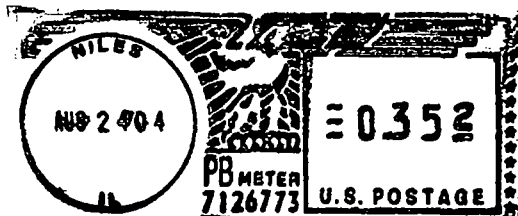


A.B. Dick Company

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